



May 4, 2018

VIA ECF

Hon. Lisa Margaret Smith
United States Magistrate Judge
United States District Court
300 Quarropas Street
White Plains, NY 10601

Re: *Crestwood Technology Group Corp. v. Patrick Dunn*
Civil Action No: 17 Civ. 8283 (KMK)

Dear Judge Smith:

This law firm represents the Plaintiff, Crestwood Technology Group Corp. ("CTG"), in the above-referenced matter. CTG respectfully requests this Court to extend the discovery deadline and/or dismiss Defendant's answer.

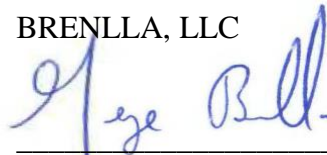
Judge Karas ordered that Requests to Admit be served by May 1, 2018 and that fact discovery be completed by June 15, 2018. By Orders dated March 28, 2018, and April 20, 2018, Your Honor directed Defendant, Patrick Dunn, to provide Plaintiff with his automatic disclosures and to respond to CTG's discovery demands. Defendant has not complied with Your Honor's Orders in any manner, despite the threat of sanctions associated with non-compliance. Further, Your Honor ordered Defendant to produce his cell phone, which I have not yet received. Based on the Defendant's failure to comply with any of the Court's Orders, which hampers CTG from prosecuting its case, CTG respectfully requests that this Court allow the Request to Admit be extended until June 15, 2018 and fact discovery be extended until July 31, 2018. In the alternative, CTG respectfully requests that this Court strike Defendant's answer for willful non-compliance.

If you should have any questions, please do not hesitate to contact the parties.

Respectfully submitted,

BRENLLA, LLC

By:



George F. Brenlla

cc: Patrick Dunn



BRENLLA, LLC
90 Park Avenue, 17th Floor
New York, New York 10016

Office: (212) 364-5173
Fax: (646) 219-0983
gfbrenlla@brenllalaw.com
www.brenllalaw.com